## 1 Thomas Myers (SBN 120674) Email: myers@smithmyerslaw.com 2 SMITH & MYERS LLP 355 South Grand Avenue, Suite 2450 3 Los Angeles, California 90071 Telephone: 213.613.2380 4 Facsimile: 213.613.2395 5 Stephen B. Edwards (pro hac vice) PA Attorney I.D. No. 326453 6 Email: sbedwards@fairnesscenter.org Nathan J. McGrath (pro hac vice) 7 PA Attorney I.D. No. 308845 Email: njmcgrath@fairnesscenter.org THE FAIRNESS CENTER 500 North Third Street Suite 600 9 Harrisburg, Pennsylvania 17101 Telephone: 844.293.1001 10 Facsimile: 717.307.3424 11 Attorneys for Plaintiff Isaac Newman 12 UNITED STATES DISTRICT COURT 13 FOR THE EASTERN DISTRICT OF CALIFORNIA 14 15 Case No. 2:24-cv-01487-WBS-SCR 16 ISAAC NEWMAN, 17 REQUEST FOR ENTRY OF Plaintiff, JUDGMENT PURSUANT TO 18 FEDERAL RULE OF CIVIL **PROCEDURE 68** v. 19 Hearing Date: October 15, 2024 ELK GROVE EDUCATION ASSOCIATION, 20 Hearing Time: 1:30 PM Location: Courtroom 5, 14th Floor Defendant. 21 Judge: Hon. William Shubb 22 23 24

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1	TO THE HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF
2	RECORD:
3	WHEREAS, on August 26, 2024, Defendant Elk Grove Education Association made an
4	Offer of Judgment to Plaintiff Isaac Newman pursuant to Federal Rule of Civil Procedure 68 (the
5	"Offer"), a copy of which is attached hereto as "Exhibit A" and incorporated by reference herein;
6	WHEREAS, Plaintiff accepted Defendant's Offer on September 5, 2024, via letter
7	transmitted by electronic and first-class mail, a copy of which is attached hereto as "Exhibit B"
8	and incorporated by reference herein;
9	PLAINTIFF RESPECTFULLY REQUESTS, that this Court enter judgment in his favor
10	and against Defendant in the amount of \$12,000 (twelve thousand dollars), consistent with the
11	terms and conditions contained in the Offer.
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13	Respectfully submitted,
14	Date: 9/5/2024 By: <u>/s/ Stephen B. Edwards</u> Stephen B. Edwards
15	Attorney for Plaintiff Isaac Newman
16	Attorney for I turnity Isaac Ivewman
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